

PLEASE TAKE NOTICE that, upon the annexed motion papers, Defendants will move this Court, before the Honorable Lawrence A. Kaplan, at the United States Court House, 500 Pearl Street, New York, NY 10007, at a date and a time to be set by the Court, for an Order pursuant to Rule 37 of the Federal Rules of Civil Procedure (a) requiring plaintiff to cure the deficiencies in her responses to defendants' Interrogatories; (b) requiring plaintiff to produce documents responsive to defendants' document requests; (c) sanctioning plaintiff for her failure to supplement her Rule 26(a)(1) disclosures in violation of this Court's March 12, 2007 Order; (d) sanctioning plaintiff for her failure to respond to the Interrogatories posed by defendant Denise Kaback in violation of this Court's March 12, 2007 Order; (e) precluding plaintiff from

taking the depositions of defendants Amy Schulman, Esq., Joseph Finnerty, Jr., Esq., and Leroy Inskeep, Esq., which she unilaterally cancelled on short notice, or, in the alternative, requiring plaintiff to pay for the costs incurred by defendants Finnerty and Inskeep in traveling to New York for their depositions and for the attorneys' fees incurred in preparing the three witnesses for their depositions; (f) precluding plaintiff from seeking economic damages against defendants as a result of her failure to comply with this Court's March 29, 2007 Order; and (g) further sanctioning plaintiff as the Court deems appropriate for plaintiff's continuing failure to produce all documents pursuant to the March 29, 2007 Order.

Dated: New York, New York
May 3, 2007

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